

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10216JLT

CARLOS PINEDA and  
ALEXANDRA PEREZ,  
Plaintiffs,

v.

DANIEL KEELER, DENNIS  
HARRIS, JOSPEH R. WATTS,  
JOSEPH P. TOOMEY, WILLIAM  
J. GALLAGHER, EDWARD  
GATELY, JANINE BUSBY, and  
the CITY OF BOSTON  
Defendants

**DEFENDANTS' ASSENTED-TO MOTION  
TO ENLARGE TIME TO FILE RESPONSIVE PLEADINGS  
PURSUANT TO FED.R.CIV.P. 6(B).**

Pursuant to Fed. R. Civ. P. 6(b), the Defendants respectfully move this Honorable Court for an extension of time to file their responsive pleadings. As grounds for their motion, the Defendants state the following:

1. The Plaintiffs have assented to the Defendants' request for more time to file responsive pleadings (Rule 7.1 certification included below);
2. Undersigned counsel requires additional time to investigate the Complaint and draft responsive pleadings;
3. Defendants Keeler, Harris, Toomey, Gallagher, Gately, Busby, and City of Boston request an extension until May 18, 2005, to file responses to Plaintiffs' Complaint; and,
4. Defendant Watts requests an extension until May 25, 2005 to file a response to Plaintiffs' Complaint;

5. Allowing this motion will not prejudice any party to the action and permitting the Defendants an extension to file responsive pleadings to Plaintiffs' Complaint will further the interests of justice.

WHEREFORE, the Defendants respectfully request that this Honorable Court allow their motion to extend time to file responsive pleadings, and for Defendants Keeler, Harris, Toomey, Gallagher, Gately, Busby, and City of Boston, set the date for filing responsive pleadings to on or before May 18, 2005, and for Defendant Watts, set the date for filing responsive pleadings to on or before May 25, 2005.

Respectfully submitted,

DEFENDANTS DANIEL KEELER, DENNIS  
HARRIS, JOSEPH R. WATTS, JOSEPH P.  
TOOMEY, WILLIAM J. GALLAGHER,  
EDWARD GATELY, JANINE BUSBY and  
CITY OF BOSTON  
Merita A. Hopkins  
Corporation Counsel

By their attorney:

/s/ Helen G. Litsas

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Helen G. Litsas  
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Chief of Litigation  
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(617) 635-4049 (Susan)

7.1 Certification

Undersigned counsel certifies that on May 11, 2005, pursuant to LR, D. Mass. 7.1(a)(2), she spoke with Plaintiff's counsel who assented to the Defendants request for more time to file responsive pleadings.

5/11/05  
Date: \_\_\_\_\_

/s/ Helen G. Litsas  
\_\_\_\_\_  
Helen G. Litsas, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, a copy of this document was served upon counsel of record via electronic filing and via U.S. Mail.

5/11/05  
Date: \_\_\_\_\_

/s/ Helen G. Litsas  
\_\_\_\_\_  
Helen G. Litsas, Esq.